

SCOTT VALLEY IRRIGATION DISTRICT
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SEP 11 2007

OPP PUBLIC DOCKET

September 3, 2007

Office of Pesticide Programs (OPP) Regulatory Public Docket (7502P)
Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460-0001

Re: Docket ID # EPA-HQ-OPP-2007-0588

Aquatic vegetation is a most serious pest in our irrigation system, it's control is costly but a necessary part of the maintenance of our system.

We must use aquatic herbicides as our canal flows year around, delivering stock water in the off irrigation season.

We have used MAGNACIDE H Herbicide in our irrigation district for 4 years. By using this one product that manages both vascular plants and algae, we use fewer chemicals and keep our costs down.

We have tried other products and have not found one that breaks down quickly to naturally occurring materials (carbon dioxide and water). If we did not have MAGNACIDE H Herbicide or it was too restrictive to use and the other available chemicals will not effectively control the unwanted vegetation and mechanical control is not feasible our water delivery will be compromised.

In the four years of applying MAGNACIDE we have not found any dead birds. Our ditch is 15 miles long and serves 26 ranches, there has never been any crop damage.

We do not supply drinking water, only irrigation water and our system is not intended to reach any source of drinking water.

We have never seen any evidence of damage to plants, animals or birds in the four years of use.

We are treating one irrigation canal. This canal was build by, paid for and maintained for the movement of irrigation water to our growers. They are not fisheries or habitat for endangered species. Only in a very drought year does the canal dry.

We find it difficult to believe that MAGNACIDE H could travel 61 miles. We see aquatic weed control for 10 miles in our application.

There is no realistic way to generalize how long a treatment will be active since velocity, quantity and species of aquatic weeds, water quality, temperature, irrigation practices all play a role in how far a treatment will move.

There is no chronic exposure to fish with the elaborate fish screens installed at our dam gates.

We do everything we can to minimize volatilization of this product when we apply. It really stinks; plus any product that volatilizes is wasted. It is too expensive to waste.

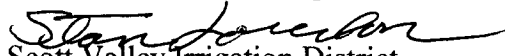
All the comments about direct and indirect affects of using MAGNACIDE H in canals would hold true for any type of aquatic weed control—chemical, mechanical or just drying up the canal.

Our district follows the label, regulations and every other law applying to the application of pesticides. Applying aquatic herbicides is not as difficult as you would make it out. We move water for the benefit of our growers and understand the complexities of our system. We have used MAGNACIDE H for four years and have never had an incident of any kind.

We support with conviction the continued registration of MAGNACIDE H Herbicide with out any further restrictions. This product is vital to the Agriculture Industry.

Sincerely,

Stanley W. Loudon, Mgr.

A handwritten signature in black ink, appearing to read "Stanley W. Loudon", written over the printed name.

Scott Valley Irrigation District

PO Box 216

Fort Jones, CA 96032